

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
MICHELLE LO (NYRN 4325163)  
Chief, Civil Division  
ELIZABETH D. KURLAN (CABN 255869)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: 415-436-7298  
Facsimile: 415-436-6748  
elizabeth.kurlan@usdoj.gov

Attorneys for Defendant

**FILED**

Jun 30 2023

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

CAROLINE BARKER,

Plaintiff,

v.

LAUREN MCFERRAN, Chairman, National  
Labor Relations Board,

Defendant.

CASE NO. 4:23-cv-0308-DMR

**SECOND STIPULATION TO ADDITIONAL  
TIME FOR DEFENDANT'S RESPONSE TO  
PLAINTIFF'S COMPLAINT AND ORDER**

The Honorable Donna M. Ryu

Pursuant to Civil Local Rule 6-2, the parties to this action hereby stipulate and respectfully request that the Court enter an order granting the following:

1. A second extension of time for Defendant to file their response to Plaintiff's complaint. Defendant will file their response to Plaintiff's complaint by July 14, 2023.
2. Continuance of the Case Management Conference currently set for July 5, 2023, Dkt. No. 14, and all associated deadlines until a time after Defendant's response due date. The parties apologize to the Court for making this request in less than the fourteen days before the scheduled conference date, due to their need to confer regarding the continuance request.

For these reasons, and as articulated below in the Declaration of Counsel, the parties respectfully request that the Court grant their stipulation.

DATED: June 28, 2023

Respectfully submitted,<sup>1</sup>

ISMAIL J. RAMSEY  
United States Attorney

s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
Assistant United States Attorney

*Attorneys for Defendant*

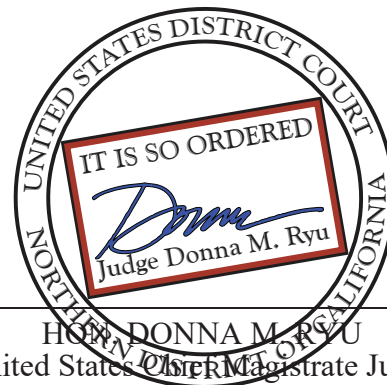
DATED: June 28, 2023

s/ Caroline Barker  
CAROLINE BARKER  
Plaintiff, *pro se*

### ORDER

Pursuant to stipulation, IT IS SO ORDERED. Defendant will file a response to Plaintiff's complaint by July 14, 2023.

DATED: June 30, 2023



HON. DONNA M. RYU  
United States District Court Magistrate Judge

<sup>1</sup> In accordance with Civil Local Rule 5-1(h)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

**DECLARATION OF ELIZABETH D. KURLAN**

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the Northern District of California and counsel of record for the federal Defendant in the above-captioned action.

2. On June 20, 2023, the Court granted the parties' stipulation to a first extension of time for Defendant's response to Plaintiff's complaint. *See* Dkt. No. 18.

3. I diligently have been preparing Defendant's response. However, Defendant recently determined that they need a brief period of additional time to finalize and file the response. Accordingly, I contacted Plaintiff regarding Defendant's request for additional time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 28, 2023

s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
Assistant United States Attorney